

PNNL PROJECT INTERFACE MEETING  
Ecology Kennewick Office  
Kennewick, Washington

May 15, 2003  
3:00 p.m. to 3:30 p.m.

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Distribution:

T. L. Aldridge	RL	K8-50
M. Anderson-Moore	Ecology	B5-18
J. V. Stangeland	PNNL	K9-26
E. L. Grohs	PNNL	K3-75
A. K. Ikenberry	PNNL	P7-79
P. J. Crane	PNNL	P7-68
D. K. Lutter	PNNL	P8-08
F. Jamison	Ecology	B5-18
H. T. Tilden	PNNL	K3-75
E. B. Dagan	RL	A5-15
W. J. Bjorklund	PNNL	P7-70
RCRA Files	PHMC	N1-25

ADMINISTRATIVE RECORD (Two Copies for Record):

~~300 Area Projects, H-0-7~~  
325 Hazardous Waste Treatment Units, T-3-4  
305-B, S-3-2  
[Care of EDMC, LMSI (H6-08)]

**RECEIVED**  
AUG 14 2003

**EDMC**


Please send comments/changes on distribution list to:  
DK Lutter, [delores.lutter@pnl.gov](mailto:delores.lutter@pnl.gov), (P8-08), (509)376-5631


Meeting Minutes Transmittal

PNNL PROJECT INTERFACE MEETING  
Ecology Kennewick Office  
Kennewick, Washington

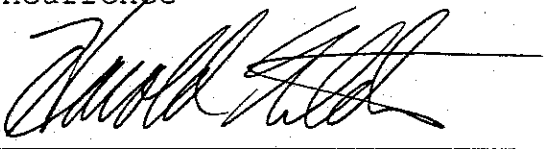
May 15, 2003  
3:00 p.m. to 3:30 p.m.

The undersigned indicate by their signatures that these meeting minutes reflect the actual occurrences of the above dated Unit Managers Meeting.

 Date: 7/17/03  
Theresa L. Aldridge, Project Manager, RL

 Date: 7/17/03  
Frederick Jamison, 300 Area Project Manager, Washington State  
Department of Ecology

Waste Management Project /PNNL Facilities Project Meeting, PNNL  
Concurrence

 Date: 7/17/03  
for Delores K. Lutter, Contractor Representative, PNNL

Purpose: Discuss Permitting Process

Meeting Minutes are attached. The minutes are comprised of the following:

- Attachment 1 - Agenda
- Attachment 2 - Summary of Discussion and Commitments/Agreements
- Attachment 3 - Attendance List
- Attachment 4 - LDR Assessment Letter

Attachment 1

PNNL Project Interface Meeting  
Ecology Kennewick Office, Room 8  
Kennewick, Washington

May 15, 2003  
3:00 p.m. to 3:30 p.m.

AGENDA

1. Approval of past minutes. (Ecology/DOE-RL/PNNL)
2. Efficiency Issues (Ecology/DOE-RL)
3. General Discussion (Ecology/DOE-RL/PNNL)
  - 305-B & 325 HWTUs Quarterly Permit Modifications (T. Aldridge/DOE-RL, E. Grohs/PNNL)
  - RLWS Status within 325 Building (T. Aldridge/DOE-RL)
  - Legacy Waste Status (T. Aldridge/DOE-RL, W. Bjorklund/PNNL)
  - Status on listed waste ONO (T. Aldridge/DOE-RL, H. Tilden/PNNL)
  - Building 3720 LDR Report
  - Discuss Agenda Items (DOE-RL, Ecology, PNNL)
4. Action Items (Ecology/DOE-RL/PNNL)
  - T. Aldridge (DOE-RL) to telephone Ecology if there are any changes to the RLWS status within 325 building. A deadline has been set for February 1, 2003.  
This action will remain open.  
OPEN
  - T. Aldridge (DOE-RL) will set up a meeting with River Corridor Contractor/PNNL/DOE-RL/Ecology, after April 1, 2003, to discuss the future and upcoming changes regarding the closure of the 325 Building, and Matrix information.  
OPEN
  - T. Aldridge (DOE-RL) to meet with Alice Ikenberry to look at the necessary budget items that Ecology needs to know about and show them how it is being tracked.  
OPEN
5. Budget Status (T. Aldridge/DOE-RL, W. Bjorklund/PNNL)
6. Set Next Project Managers Meeting (Ecology/DOE-RL/PNNL)
  - July 17, 2003
  - Ecology Kennewick Office
  - Kennewick, WA
  - 3:00 - 3:30 p.m.

Proposed topics may be submitted to D. K. Lutter, e-mail [delores.lutter@pnl.gov](mailto:delores.lutter@pnl.gov),  
(Work) 376-5631, (Fax) 376-2329

## Attachment 2

### PNNL Project Interface Meeting Ecology Kennewick Office Kennewick, Washington

May 15, 2003  
3:00 p.m. to 3:30 p.m.

1. Approval of past minutes

The March 27, 2003, Project Manager Meeting (PMM) minutes were approved.

2. Efficiency Issues

M. Anderson-Moore (Ecology) whether a monthly summary submittal to Ecology was submitted in April for the alternate month that the meeting was not held. H. Tilden (PNNL) stated that he thought T. Aldridge (DOE-RL) had sent an email to F. Jamison (Ecology) though he was uncertain of its content. He will followup to determine if it was sent.

3. General Discussions (Ecology/DOE-RL/PNNL)

- 305-B and 325 HWTUs Quarterly Permit Modifications (T. Aldridge/DOE-RL, E. Grohs/PNNL)

Annual revisions of the Building Emergency Plans for 305-B and 325 RPL will be submitted along with minor changes to the 305-B Waste Analysis Plan and Chapter 6. These will be submitted by July 10<sup>th</sup>.

- RLWS Status within 325 Building

T. Pietrok (DOE-RL) indicated there has been no status change.

- Legacy Waste Status

M. Peterson (PNNL) provided information on the 604 glovebox and the Radon Holdup System removal. A couple of legacy projects were being delayed due to the RPL closure plans. Other than that everything is on schedule and proceeding well.

- Status on listed waste ONO

H. Tilden (PNNL) said the contained in determination letter is going through the PNNL signatory process and then it will go to DOE-RL through their process to Ecology.

- Building 3720 LDR Report

H. Tilden (PNNL) stated that the LDR assessment has been completed. The potential mixed waste reported in recent years' LDR reports turned out to be non-potential mixed waste. No other potential mixed waste was identified during the assessment. Since there were no data gaps identified, the assessment will also serve as the Data Gap Plan. A copy of the letter and assessment is attached to these minutes ( Attachment 4).

- Discuss Agenda Items

- M. Anderson-Moore (Ecology) said the format should remain as is and continue to meet every other month to see how things go.
- T. Pietrok (DOE-RL) discussed the transition of the EM and SC offices starting within the next two weeks. More information will be provided as the transition takes place and the new offices are formed.

4. Action Items (Ecology/DOE-RL/PNNL)

T. Aldridge (DOE-RL) to telephone Ecology if there are any changes to the RLWS status within 325 building. A deadline has been set for February 1, 2003.

This action will remain open.

OPEN

T. Aldridge (DOE-RL) will set up a meeting with River Corridor Contractor/PNNL/DOE-RL/Ecology, after April 1, 2003, to discuss the future and upcoming changes regarding the closure of the 325 Building, and Matrix information.

OPEN

T. Aldridge (DOE-RL) to meet with Alice Ikenberry to look at the necessary budget items that Ecology needs to know about and show them how it is being tracked.

OPEN

5. Set Next Project Mangers Meeting (Ecology/DOE-RL/PNNL)

July 17, 2003

Ecology Building

Kennewick, Washington

3:00 – 3:30 p.m.

Proposed topics may be submitted to D. K. Lutter, e-mail [delores.lutter@pnl.gov](mailto:delores.lutter@pnl.gov), (Work) 376-5631, (Fax) 376-2329.

**PNNL Project Interface Meeting  
Ecology Kennewick Office  
Kennewick, Washington**

## Attendance List

[illegible]

**Attachment 4**

**PNNL Project Interface Meeting  
Ecology Kennewick Office  
Kennewick, Washington**

**May 15, 2002  
3:00 p.m. to 3:30 p.m.**

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# Pacific Northwest National Laboratory

Operated by Battelle for the  
U.S. Department of Energy

April 21, 2003

Mr. Roger F. Christensen, Director  
Laboratory Operations Division  
U.S. Department of Energy  
P.O. Box 550, MSIN K8-50  
Richland, Washington 99352-0550

Dear Mr. Christensen:

## LAND DISPOSAL RESTRICTIONS (LDR) ASSESSMENT AND DATA GAP PLAN FOR ENVIRONMENTAL SCIENCES LABORATORY (3720 BUILDING)

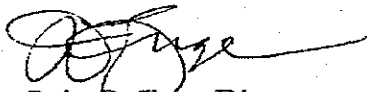
In a letter dated June 17, 2002, the Department of Energy, Richland Operations Office (RL) directed Pacific Northwest National Laboratory (PNNL) to conduct certain self-assessments pursuant to the schedule given in the annual LDR report (DOE/RL-2002-21). This letter transmits the results of the self-assessment performed on the 3720 building as scheduled in the annual LDR report. The support provided by Ms. Theresa Aldridge of your staff in the scheduling and performance of this assessment is gratefully acknowledged.

The assessment determined that no potential mixed waste is presently in the 3720 Building, and no conditions were found with regard to current waste generation issues. Hence, no data gaps exist. The report also does not recommend future re-assessment of the facility due to its pending closure.

This information will be shared with the State of Washington Department of Ecology in our regularly scheduled Project Managers Meeting on May 15, 2003.

If you have any questions or need further information concerning this self-assessment report, please contact Mr. Harold Tilden on 375-2966.

Sincerely,



Roby D. Enge, Director  
Environment, Safety, Health and Quality

RDE:HTT:mew

Attachments

902 Battelle Boulevard • P.O. Box 999 • Richland, WA 99352

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Telephone 509-376-1187 • Email [Roby.Enge@pnl.gov](mailto:Roby.Enge@pnl.gov) • Fax 509-376-1660



Pacific Northwest National Laboratory  
Environmental Management Services Department

Assessment of 3720 Building (Environmental Sciences Laboratory)  
Pursuant to Land Disposal Restrictions (LDR) Compliance Requirements

H. T. Tilden  
S. P. Juracich

Assessment Number: LOS-Q2.1.2  
ATS Assessment Number: 4758

Report Date: March 2003

Executive Summary

A compliance assessment of the 3720 Building was conducted to determine compliance with applicable Environmental Protection Agency (EPA) and Washington Department of Ecology (Ecology) standards dealing with the Land Disposal Restrictions (LDR). This inspection is required by the DOE assessment schedule included in the annual LDR report. The inspection began on June 30, 2002 and included a facility walkthrough on July 10, 2002 and subsequent document reviews.

The inspection revealed that there is currently no potential mixed waste (PMW) in 3720. The potential mixed waste table (PMWT) entries reflected in the 2001 LDR report (DOE/RL-2002-21) are the result of a telephone discussion with facility staff prior to the initial production of the 1999 LDR report. Since that report, reutilization of contaminated laboratory equipment has taken place, along with further clarification from Ecology as to what is to be included in the report as PMW. The results of this inspection will be used to update the PMWT for the 2002 report.

The inspection and subsequent review of other periodic self-assessments performed indicate that there are no noncompliance issues with current-generation mixed waste.

This inspection report contains no findings or concerns. A repeat inspection is not recommended for this facility under the LDR program.

Introduction

The Environmental Sciences Laboratory (3720 Building) is utilized by Pacific Northwest National Laboratory (PNNL) for analytical laboratory activities, many involving radioactive and/or hazardous samples. At the time of this inspection, approximately half of the laboratory spaces were in use. Several were undergoing renovation, and the others

are vacant. The 3720 Building will be demolished as part of the accelerated closure activities in the 300 Area.

Beginning with the 1999 report, the Department of Energy, Richland Operations Office (RL) and the Hanford Site prime contractors have included inspection schedules for facilities treating, storing or disposing current generation mixed waste and/or containing potential mixed waste (PMW). These focused inspections are intended to determine the conditions under which current and potential mixed wastes are held, and to identify any knowledge gaps that may exist with respect to PMW.

As the 3720 Building has been identified as containing PMW, an inspection of the 3720 Facility was scheduled for the second quarter of 2002. In the spring of 2002, a letter was sent from RL to PNNL directing PNNL to perform this inspection.

#### Scope and Standards Used for Inspection

The scope of this inspection included a review of the specific items that were identified in 1999 as potential mixed waste items. All laboratory spaces (active and inactive) were inspected to identify any other potential mixed waste. Active generator accumulation (satellite and 90-day areas) was not assessed, but the results of previous assessments on these areas were reviewed for issues.

Potential mixed waste items were evaluated pursuant to the criteria given in the 2001 LDR Report instructions. The facility was further evaluated according to relevant RCRA standards using the attached checklist, based on an Ecology-developed checklist used for the assessment conducted at the 224-T facility in 2002. This facility level self-assessment is consistent in scope and content to previous LDR assessments.

#### Summary of Compliance Status

**Current Generation Waste:** Although satellite and 90-day accumulation are technically outside the scope of the inspection, records of routine self-assessments were reviewed to determine if there are issues that indicate non-compliance with requirements or a potential to create PMW through current generation. No issues were found.

**Potential Mixed Waste:** The items causing 3720 to be listed in the PMWT (a used drying oven with radioactive contamination, and a fume hood in Room 502) were inspected. The oven was determined to be "in use", as its internal contamination does not preclude its further use and it is presently being used as a backup for ongoing analytical work in Room 602. It is not in "standby" as previously thought. (See photo 1).

The fume hood in Room 502 is empty and idle. It is contaminated both with radioactive materials and beryllium. The fume hood is a large piece of equipment (see photo 2) and is attached to existing building ventilation systems. As such, PNNL considers the fume hood to be integral to the building and hence not potential mixed waste. (See DOE/RL-2002-21, Appendix C, Table C-1.)

Two other fume hoods, one each in Room 602 and Room 9, were identified as idle during the inspection and potentially contaminated with both radioactive and hazardous constituents. The room 602 fume hood is shown in photo 3. The hood in Room 9 was not photographed due to inability to enter the room; the room was inspected through the window in the door. Both of these fume hoods are connected to the building ventilation system and are substantial pieces of equipment. PNNL considers these fume hoods to be integral to the building and hence not potential mixed waste.

All idle fume hoods in the facility were managed according to appropriate standards of care. No hazardous materials were noted in these hoods.

In summary, no potential mixed waste issues were found.

Mixed Waste In Storage: No mixed waste is currently treated or stored in the facility. No issues were found.

#### Summary of Potential Mixed Waste Information and Gaps

As no potential mixed waste currently exists in 3720, this section is not applicable.

#### Conclusion

There are no issues involving mixed waste or PMW in the 3720 Building. The information developed during this inspection will be used to update the PMWT in the 2002 LDR Report.

A follow-up inspection for 3720 is not recommended. No actual or potential mixed waste is being stored or otherwise managed in 3720 (generator accumulation is still practiced). PNNL is planning to relocate its activities currently located in 3720 and vacate the 3720 building in preparation for deactivation and demolition of the facility as part of the accelerated River Corridor remediation schedule. Contaminated building components will be managed as part of the 300 Area remediation activities.

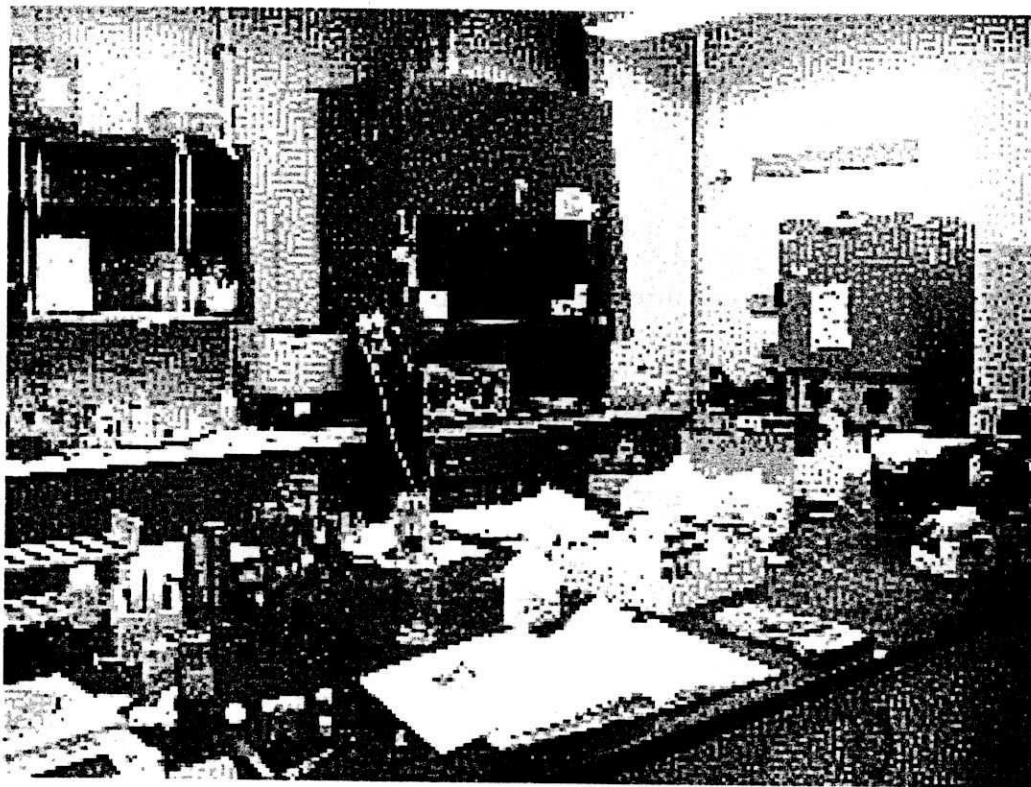


Photo 1. Lab 602, 3720 Building. Contaminated Oven in use on benchtop at right.  
(Photo taken 7/10/02)



Photo 2. Contaminated fume hood in Room 502, 3720 Building. Drums of low-level waste are located nearby. (Photo taken 7/10/02)

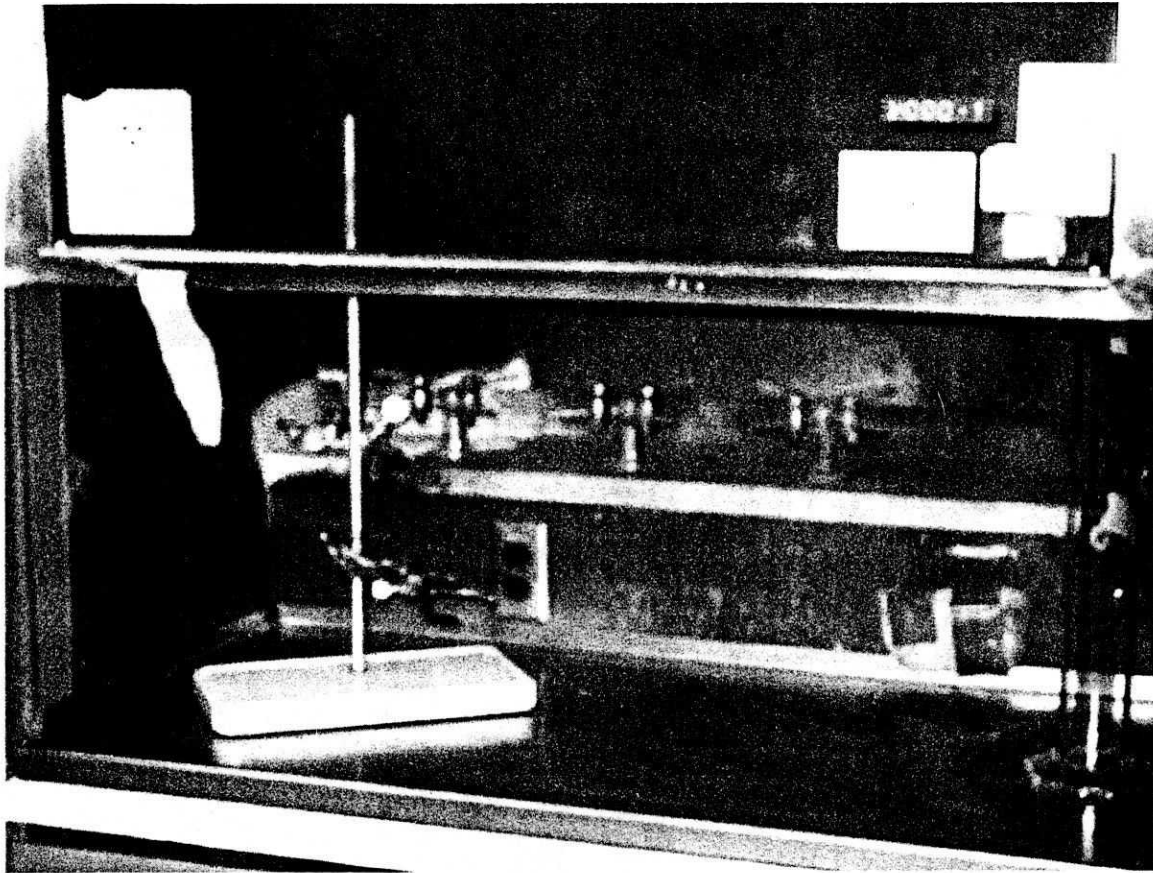


Photo 3. Idle fume hood in Room 602. Small area of fixed radioactive contamination is painted over in upper left. (Picture taken 2/13/03)

**Attachment – Assessment Checklist**  
**Environmental Sciences Laboratory (3720 Building)**  
**Date of Assessment: July 10, 2002**

WAC 173-303 or 40 CFR citation	Requirement	Criteria applies to location for evaluation (Y/N)?	Meets criteria (Y/N/blank)?	Comments
	Matrices Investigated: <ul style="list-style-type: none"> <li>• <i>Laboratory Equipment</i></li> <li>• <i>Hoods and gloveboxes</i></li> <li>• <i>All laboratory spaces in the facility were included in the walkthrough.</i></li> </ul>			The first two matrices are listed in Columns D and E, respectively, of the Potential Mixed Waste Table in the 2001 LDR Report (DOE/RL-2002-21).
<b>General Requirements</b>				
WAC: -140	LDR refers to 40 CFR 268			
268.7(a)(1)	Has a waste determination been performed to assign waste codes?	Y	Y	Evaluation only based on current generation (no PMW)
268.7(a)(1)	Can a treatment standard be assigned to the matrix?	Y	Y	
268.7(a)(1)	Is the treatment standard met for the matrix?	Y	Y	
268.7(a)(2), (3), and (4)	Has the required information been submitted to the receiving storage or treatment unit/facility?	Y	Y	
268.7(a)(5)	Has treatment-by-generator requirements been used? Is a waste analysis plan necessary?	Y	Y	
268.7(a)(6)	Has knowledge for contaminated soil been retained in records?	Y	Y	
268.7(a)(7)	Is the matrix excluded from the definition of hazardous waste or solid waste? Is the explanation in the records?	Y	Y	
268.7(a)(8)	Are LDR records maintained on site for 3 years.	Y	Y	
268.7(a)(9)	Will a labpack be managed using the alternative treatment standards?	Y	Y	
WAC: -280	General requirements for dangerous waste management facilities. Is there a Part A? Is the location included?	N		
WAC: -281	Notice of Intent	N		
WAC: -282	Siting Criteria	N		
WAC: -283	Performance standards. Are they met?	Y	Y	The Hanford Site meets the performance standards.
WAC: -300	General Waste Analysis. Is there a detailed description of waste that has been received? Is there a waste analysis plan per (5) and (6)? Get copy. Does the plan meet the criteria?	N		
WAC: -310	Security. Are there signs posted, 24-hour surveillance, or barrier, per (2)?	Y		
WAC: -320	General Inspections: Is there a written schedule per (2)? Get	Y		Current generation is inspected quarterly; building

**Attachment – Assessment Checklist**  
**Environmental Sciences Laboratory (3720 Building)**  
**Date of Assessment: July 10, 2002**

WAC 173-303 or 40 CFR citation	Requirement	Criteria applies to location for evaluation (Y/N)?	Meets criteria (Y/N/blank)?	Comments
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268.7(a)(1)	Can a treatment standard be assigned to the matrix?	Y	Y	
268.7(a)(1)	Is the treatment standard met for the matrix?	Y	Y	
268.7(a)(2), (3), and (4)	Has the required information been submitted to the receiving storage or treatment unit/facility?	Y	Y	
268.7(a)(5)	Has treatment-by-generator requirements been used? Is a waste analysis plan necessary?	Y	Y	
268.7(a)(6)	Has knowledge for contaminated soil been retained in records?	Y	Y	
268.7(a)(7)	Is the matrix excluded from the definition of hazardous waste or solid waste? Is the explanation in the records?	Y	Y	
268.7(a)(8)	Are LDR records maintained on site for 3 years.	Y	Y	
268.7(a)(9)	Will a labpack be managed using the alternative treatment standards?	Y	Y	
WAC: -280	General requirements for dangerous waste management facilities. Is there a Part A? Is the location included?	N		
WAC: -281	Notice of Intent	N		
WAC: -282	Siting Criteria	N		
WAC: -283	Performance standards. Are they met?	Y	Y	The Hanford Site meets the performance standards.
WAC: -300	General Waste Analysis. Is there a detailed description of waste that has been received? Is there a waste analysis plan per (5) and (6)? Get copy. Does the plan meet the criteria?	N		
WAC: -310	Security. Are there signs posted, 24-hour surveillance, or barrier, per (2)?	Y		
WAC: -320	General Inspections: Is there a written schedule per (2)? Get	Y		Current generation is inspected quarterly; building



WAC 173-303 or 40 CFR citation	Requirement	Criteria applies to location for evaluation (Y/N)?	Meets criteria (Y/N/blank)?	Comments
	copy. Is there an inspection log? Get copy from last month. Have any problems been remedied?			walkthroughs occur periodically.
WAC: -330	Personnel training. Is there a training program? Is there a written training plan per (2)?	Y	Y	Generator training requirements apply.
WAC: -335	Construction Quality Assurance	N		
WAC: -340	Preparedness & Prevention. Is required equipment identified? If not, has demonstration been performed per (1)? Are there communications or alarms per (2)? Is aisle space maintained per (3)?	Y	Y	
WAC: -350	Contingency Plan and emergency procedures. Is there a contingency plan? Get copy. Does it contain criteria in (3)? Is a copy maintained per (4)? Is it up to date per (5)?	Y	Y	
WAC: -355	SARA Title III	N		This is a site-wide provision not applicable to the location.
WAC: -360	Emergencies. Is there an emergency coordinator per (1) (BED/BW)? Has there ever been an emergency? If so, were procedures implemented per (2)?	Y	Y	
WAC: -370	Manifest system. Has waste received been manifested or transferred with on-site shipping records?	N		
WAC: -380	Facility recordkeeping. Is there an operating record? If so, does it contain the information per (1)? Are records maintained per (2)?	N		
WAC: -390	Facility Reporting. Has any unmanifested waste been reported per (1)? Has information been included in annual reports per (2)? Has any additional information been reported per (3)? Are copies maintained per (4)?	N		Current generation waste is reported at the site level.
WAC: -395	Other general requirements. Does ignitable, reactive, or incompatible matrices exist at the location? If so, are precautions in (1) taken? Are tanks and containers labeled per (6)?	Y	Y	
WAC: -610	The TPA Action plan requires closure pursuant to WAC 173-303-610. 40 CFR Subpart G is not used for closure of TSD units at Hanford.			
WAC: -610(2)	Has closure standard of remove or decontaminate been met?	N		
WAC: -	Is there a written closure plan?	N		

WAC 173-303 or 40 CFR citation	Requirement	Criteria applies to location for evaluation (Y/N)?	Meets criteria (Y/N/blank)?	Comments
610(3)	Does the plan meet the criteria? Is the plan current?			
WAC: - 610(3)(c)	Has there been notification of partial closure?	N		
WAC: - 610(4)	Are timeframes met for closure? Has a demonstration for delay of closure been submitted?	N		
WAC: - 610(5)	Has waste been removed, treated, or disposed per approved closure plan per -610(5)?	N		
WAC: - 610(6)	Has certification of closure been submitted to Ecology?	N		
WAC: -646	Corrective Action. Has there been a release? If so, were any corrective actions taken? Get any documentation.	N		
265 Subpart AA	Air emissions for process vents. Are there process vents per .1030? If yes, is unit subject to requirements?	N		
265 Subpart BB	Air emissions standards and equipment leaks	N		
265 Subpart CC	Air emissions for tanks, containers, and surface impoundments	N		Mixed waste is exempt from Subpart CC requirements.
<b>Specific Requirements</b>				
WAC: - 400(3)(a)	The types of waste management requirements for 40 CFR Subparts for this location include:  -Containers (Subpart I)			All current generation waste is managed in containers.
265 Subpart I	<b>Use and management of containers</b>			
265.171	Is container in good condition?	Y	Y	
265.172	Is waste compatible with the container?	Y	Y	
265.173	Management of containers. Are containers closed? Are the containers managed to prevent rupture?	Y	Y	
265.174	Inspections. Are weekly inspections performed?	Y	Y	
265.176	Ignitable and reactive waste. Are ignitable and reactive waste 50 feet from Hanford Site property line	Y	Y	
265.177	Incompatible waste. Are incompatible wastes separated or otherwise protected?	Y	Y	
265.178	Is waste managed in compliance with the air emission standards of Subpart AA, BB, and CC?	N		See above.
WAC: - 630(3)	Are containers labeled per - 630(3)?	Y	Y	

WAC 173-303 or 40 CFR citation	Requirement	Criteria applies to location for evaluation (Y/N)?	Meets criteria (Y/N/blank)?	Comments
WAC: - 630(7)	Are containers provided with secondary containment?	Y	Y	

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